

IN THE UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF GEORGIA
ATHENS DIVISION

CYNTYIA D. HALL	:	CHAPTER 13
DEBTOR	:	CASE NO: 10-30006
SS# XXX-XX-0145	:	

NOTICE OF MOTION TO EXTEND THE STAY
UNDER 11 U.S.C. § 362(c)(3), DEADLINE FOR FILING WRITTEN
OBJECTIONS AND HEARING DATE AND TIME IF OBJECTION
IS TIMELY FILED

NOTICE IS HEREBY GIVEN PURSUANT TO M.D. GA LBR 9001-(b)(5) THAT DEBTOR, CYNTHIA D. HALL HAS FILED PAPERS WITH THE COURT TO CONTINUE AND EXTEND THE AUTOMATIC STAY UNDER 11 U.S.C. SECTION 362 BEYOND THE 30TH DAY AFTER THE FILING OF THIS BANKRUPTCY CASE.

YOUR RIGHTS MAY BE AFFECTED. YOU SHOULD READ THESE PAPERS CAREFULLY AND DISCUSS THEM WITH YOUR ATTORNEY, IF YOU HAVE ONE IN THIS BANKRUPTCY CASE. (IF YOU DO NOT HAVE AN ATTORNEY, YOU MAY WISH TO CONSULT ONE.)

IF YOU DO NOT WANT THE COURT TO EXTEND THE STAY IN THE DEBTOR(S) CASE BEYOND THE 30TH DAY AFTER THE FILING OF THE BANKRUPTCY CASE, OR IF YOU WANT THE COURT TO CONSIDER YOUR VIEWS ON THE EXTENSION OF THE STAY, THEN YOU MUST FILE WITH THE COURT A WRITTEN OBJECTION TO THE PROPOSED EXTENSION ON OR BEFORE JANUARY 29, 2010.

IF YOU DESIRE TO FILE A RESPONSE YOU MUST TRANSMIT IT TO THE COURT FOR FILING, AND YOU MUST TRANSMIT IT EARLY ENOUGH SO THAT THE COURT WILL **RECEIVE** IT ON OR BEFORE THE DATE STATED ABOVE.

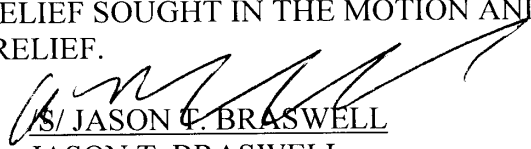
IF NO OBJECTION IS FILED, THEN THE RELIEF SOUGHT IN THE DEBTORS' MOTION MAY BE GRANTED BY THE COURT. IF YOU FILE AN OBJECTION TO THE DEBTOR'S MOTION, THEN YOU AND/OR YOUR ATTORNEY MUST ATTEND THE HEARING ON THE DEBTOR'S MOTION AND YOUR OBJECTION. **YOU MUST BOTH FILE AN OBJECTION AND ATTEND THE HEARING ON THE DEBTOR'S MOTION IF YOU WISH TO BE HEARD ON THIS MATTER.**

THE HEARING ON THE DEBTOR'S MOTION AND ANY OBJECTION TO THE MOTION SHALL BE HELD ON FEBRUARY 17, 2010 AT 1:30 P.M. IN U.S. COURTROOM-ATHENS, U.S. POST OFFICE BLDG, 115 EAST HANCOCK AVENUE, ATHENS, GA 30601

ANY OBJECTION/RESPONSE MUST ALSO BE TRANSMITTED TO THE DEBTOR(S), THE UNDERSIGNED ATTORNEY FOR THE DEBTOR(S) AND THE CASE TRUSTEE.

IF YOU OR YOUR ATTORNEY DO NOT TAKE THESE STEPS, THE COURT MAY DECIDE THAT YOU DO NOT OPPOSE THE RELIEF SOUGHT IN THE MOTION AND MAY ENTER AN ORDER GRANTING THAT RELIEF.

DATED: January 6, 2010


/s/ JASON T. BRASWELL
JASON T. BRASWELL
ATTORNEY FOR DEBTOR(S)
STATE BAR NO: 078373
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IN THE UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF GEORGIA
ATHENS DIVISION

CYNTHIA D. HALL : CHAPTER 13
DEBTOR : CASE NO: 10-30006-RFH
SS# XXX-XX-0145 :

MOTION TO EXTEND THE STAY
UNDER 11 U.S.C. § 362(c)(3)

Now comes, Cynthia D. Hall, Debtor herein, and files this motion for extension of the automatic stay provided by 11 U.S.C. § 362(c)(3)(B) and shows the following:

1.

Debtor filed a previous bankruptcy case 06-30136 which was pending during the year preceding the filing of the current case. That case was dismissed July 22, 2009.

2.

Debtor's previous case was dismissed for failure to maintain plan payments.

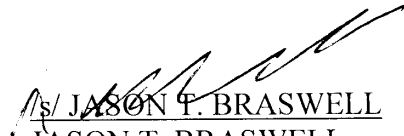
3.

Debtor's income has increased substantially and is now sufficient to fund the proposed plan.

4.

The proposed plan provides for all of her creditors and has been filed in good faith as to those creditors.

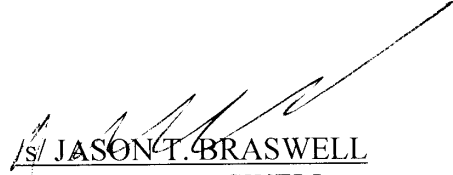
WHEREFORE, Debtor prays the Court find that this case has been filed in good faith and extend the protection of the automatic stay provided by 11 U.S.C. § 362 as to all creditors.


/s/ JASON T. BRASWELL
JASON T. BRASWELL
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CERTIFICATE OF SERVICE

I certify that I have this day served a copy of the foregoing Notice and Motion on the creditors listed on the attached Mailing Matrix by placing same in the U.S. Mail, properly addressed and with sufficient postage to insure delivery and on the Trustee by ECF.

This 1st day of January, 2010.


/s/ JASON T. BRASWELL
JASON T. BRASWELL
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(706)548-7070